

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**JAMES EVERETT SHELTON,  
individually and on behalf of all those  
similarly situated,**

**Plaintiff,**

**v.**

**DIRECT ENERGY, LP AND KAA  
ENERGY, INC.**

**Defendants.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**Case No. 1:19-cv-81**

**Magistrate Judge David A. Ruiz**

**JOINT REPORT PROPOSING REVISED CASE MANAGEMENT DATES**

Plaintiff James Everett Shelton and Defendants Direct Energy, LP and KAA Energy, Inc. submit this joint proposal of revised case management dates pursuant to this Court's Order of February 21, 2019 (Doc. 49).

	<u>PROPOSED DATE</u>
Defendants' deadline to file motions for summary judgment, if any, regarding Plaintiff's alleged consent	June 22, 2019
Discovery deadline relevant to the appropriateness of certification of the proposed class	6 months after the Court's ruling on Defendants' motions for summary judgment regarding Plaintiff's alleged consent
Plaintiff's expert report deadline	30 days after discovery deadline relevant to appropriateness of class certification
Defendants' expert report deadline	30 days after Plaintiff's expert report deadline
Expert deposition deadline	30 days after Defendants' expert report deadline
Motion for class certification deadline	14 days after expert deposition deadline

Respectfully submitted,

/s/ Brian K. Murphy

Brian K. Murphy, Trial Attorney (0070654)  
Jonathan P. Misny (0090673)  
Murray Murphy Moul + Basil LLP  
1114 Dublin Road  
Columbus, OH 43215  
(614) 488-0400  
(614) 488-0401 *facsimile*  
E-mail: [murphy@mmb.com](mailto:murphy@mmb.com)  
[misny@mmb.com](mailto:misny@mmb.com)

Anthony Paronich (Admitted *Pro Hac Vice*)  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
(508) 221-1510  
E-mail: [anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)

*Counsel for Plaintiff*

/s/ William B. Thomas, per email auth. 4.8.19

Ashley L. Olier (0085628)  
Frost Brown Todd LLC  
10 W. Broad Street, Suite 2300  
Columbus, OH 43215  
(614) 559-7227  
(614) 464-1737 *facsimile*  
E-mail: [aolier@fbtlaw.com](mailto:aolier@fbtlaw.com)

Michael D. Matthews, Jr. (Admitted *Pro Hac Vice*)

William B. Thomas (Admitted *Pro Hac Vice*)

McDowell Hetherington LLP  
1001 Fannin Street, Suite 2700  
Houston, TX 77002  
(713) 337-5580  
(713) 337-8850 *facsimile*  
E-mail: [matt.matthews@mhllp.com](mailto:matt.matthews@mhllp.com)  
[william.thomas@mhllp.com](mailto:william.thomas@mhllp.com)

*Counsel for Defendant Direct Energy, LP*

/s/ Gregory G. Guice, per email auth. 4/8/19

Gregory G. Guice, Trial Attorney (0076524)  
Reminger Co., L.P.A.  
101 W. Prospect Ave., Suite 1400  
Cleveland, OH 44115  
(216) 687-1311  
(216) 687-1841 *facsimile*  
E-mail: [gguice@reminger.com](mailto:gguice@reminger.com)

*Counsel for Defendant KAA Energy, Inc.*